

LAW OFFICES OF ALLA V. VOROBETS

Alla V. Vorobets, SBN 258586

avorobets@vorobetslaw.com

Celia R. Bernal, SBN 150063

cbernal.vorobetslaw@gmail.com

9270 Madison Avenue

Orangevale, CA 95662

Tel: (916) 966-8529

Fax: (916) 966-8527

Email: *avorobets@vorobetslaw.com*

Attorney for Defendants

TEACHBK, INC., ILYA KISELEV, and

ANDREI BURTSEV

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

MIRIAM GOLDBERG, a/k/a Marina
Sokolovskaya,

Plaintiff,

vs.

TEACHBK, INC., ILYA KISELEV and
ANDREI BUTSEV

Defendants.

Case No.: 3:24-cv-4525

**DECLARATION OF ILYA KISELEV IN
SUPPORT OF DEFENDANTS' SPECIAL
MOTION TO STRIKE PLAINTIFF'S
COMPLAINT**

[Cal. Civ. Proc. Code § 425.16]

Date: November 12, 2024

Time: 10:30 a.m.

Judge: Hon. Lisa J. Cisneros

Dept: Courtroom G, 15th Floor

**Location: San Francisco Courthouse
450 Golden Gate Ave.,
San Francisco, CA 94102**

Action Filed: July 26, 2024

1 I, ILYA KISELEV, declare:

2 1. I am a Defendants in this action.

3 2. I have personal knowledge of the facts set forth in this declaration and am
4 competent to testify as a witness. If called as a witness, I could and would testify to the truth of
5 the matters set forth herein. I make this declaration in support of Defendants' Special Motion to
6 Strike Plaintiff's Complaint.

7 3. I was born in Russia, and lived there until 2022, when I fled Russia due to my
8 opposition to the current Putin regime and its subsequent prosecution of me. I attained
9 admission to the United States by crossing the border and asking for political asylum from the
10 U.S. government. My asylum petition in the immigration court was only recently concluded.

11 4. Prior to escaping Russia, I was, at one time, a credentialed journalist and a
12 lawyer by training.

13 5. Since 2008, while I lived in Russia, I worked with various political opposition
14 leaders (Alexei Navalnyy, Ilya Yashin, etc.) and was part of the political movement opposed to
15 the current government. Because of my political opposition, I got into crosshairs of a Moscow
16 politician Valeriy Katkov ("Katkov"), who continues to have political connections to the
17 present Russian government.

18 6. Katkov, a pro-Putin Russian politician, served in various political positions from
19 2005 to 2024. While he was removed from the position because of protests against his blatant
20 misuse of his position, he remains an integral part of the pro-Putin propaganda machine in that,
21 among other things, he owns and operates a Kremlin-approved propaganda publication, serves
22 as a consultant to Moscow government, and has been appointed to Academia RMA where he
23 teaches municipal law-making to Russian ministers, deputies, and employees. Katkov is a
24 leading Russian theorist and practitioner of the municipal law-making. Katkov is not, and never
25 has been, identified with the opposition.

26 7. In September, 2019, I was sued for defamation by Katkov in Moscow municipal
27 court. Thanks to the fearless defense of my legal counsel and the courage of an honest judge, I
28 prevailed in that lawsuit, as well as the subsequent appeal Katkov filed in September, 2021.

1 However, as a result of this victory, I was forced to flee Russia, the judge was removed from
2 her post by the Russian government and my own attorney went into hiding.

3 8. In February, 2022, I fled to the U.S. As part of the standard process, I was
4 detained at the U.S. border and held in immigration detention. Once on U.S. soil, I filed an
5 application for political asylum with the U.S. government, which was recently approved.

6 9. In an effort to help others avoid some of the difficulties I experienced when
7 travelling from Russia to the U.S., I joined forces with Andrei Burtsev to create TeachBK, Inc.,
8 a corporation we originally incorporated in Florida, but dissolved shortly before Plaintiff filed
9 her Complaint on advice of our CPA. On August 30, 2024, we re-incorporated TeachBK, Inc.
10 in the state of California.

11 10. We created TeachBK website to provide information about the process of
12 immigrating to the United States (including via asylum). Later, when demand for this
13 information became increasingly requested, a YouTube channel, Instagram, and a host of other
14 social media accounts by the same moniker were added as well. The goal of TeachBK channel
15 and accounts is to discuss current issues and trends related to the U.S. immigration system, post
16 educational information on adaptation to life in the U.S., and conduct interviews with political,
17 social, and community leaders of the Russian refugee diaspora in the U.S. and abroad. The
18 majority of content posted on the TeachBK accounts, however, centers on issues of immigration
19 and petitioning for asylum by Russians who oppose the current Russian government to the U.S.
20 TeachBK channels enjoy the largest social media following of its kind in the U.S.

21 11. Commencing in or around January, 2023, Mr. Burtsev and I (through TeachBK
22 channels and platforms) began receiving concerning communications from other asylees (some
23 still in Russia; others in the United States) that their personal information – including their
24 present location – was getting back to the authorities in Russia placing them in grave danger of
25 personal injury and/or death.

26 12. Eventually, we learned through those asylum seekers that Marina
27 Sokolovskaya/Plaintiff was connected to this information leak. However, neither Mr. Burtsev
28 nor myself had any personal interaction with Plaintiff until January of 2023, when she accused
us of selling fake identification documents via TeachBK Telegram channel.

1 13. In or about March 2023, we were contacted by Pavel Ledestimminov, who
2 informed us he sent his personal information to Plaintiff because he wanted a legal consultation
3 about immigration to the U.S. Mr. Ledestimminov also told us that within days of providing
4 his story to Plaintiff, she recorded a video for her YouTube channel where she repeated,
5 verbatim, Mr. Ledestimminov's information, verbatim, to her subscribers that number over
6 30,000. Mr. Ledestimminov then agreed to be interviewed about this leak by Plaintiff by Mr.
7 Burtsev and myself for posting on our TeachBK YouTube channel.

8 14. Shortly thereafter, my Russian attorney VV Andreyev, who had represented me
9 throughout the Katkov litigation, made contact and told me: (1) Katkov had demanded my
10 attorney sign a declaration that I am a "bad actor", (2) my attorney was threatened by the
11 Foreign Intelligence Service of the Russian Federation for his refusal to sign such declaration,
12 and (3) Plaintiff was the source of Katkov's knowledge as to my immigration to the U.S. and
13 current whereabouts. After providing me with a declaration regarding these matters, the
14 attorney went into hiding with his family and was not heard from since (until recently).
15 Attached hereto as **Exhibit 1** is a true and correct translated copy of the declaration provided to
16 me by VV Andreyev attesting to Katkov's demands that he sign a declaration about me.

17 15. A few months after Plaintiff's contact with Katkov, his Russian publication
18 printed an article authored by Katkov about my request for asylum in the U.S. The article
19 indicated that Plaintiff's "associates" are doing everything they can to ensure I am unsuccessful
20 in my efforts to obtain political asylum in the U.S. These events prompted me to relocate to
21 California. Attached hereto as **Exhibit 2** is a true and correct translated copy of the article
22 authored by Katkov in his publication about my immigration to and location in the U.S.

23 16. Once I learned of Plaintiff's contacts with Katkov, Mr. Burtsev and I recorded
24 videos discussing this issue, asking questions of how a U.S. citizen like Plaintiff has access to a
25 well-connected Moscow politician, and overall cautioning our subscribers to be diligent with
26 the information they provide in their immigration quest. In our videos, we advised asylum
27 seekers, like ourselves, to be discerning in whom they shared their information with, which
28 necessarily included warning them about people who are not careful with that information
(referring to, i.e. the posting Plaintiff made on her public platform revealing the details

1 concerning her “client”), and/or persons who allowed that information to reach the ears of the
2 political machine in Russia.

3 17. I have never labeled nor accused Plaintiff of being a “Kremlin agent” or a “spy”.

4 18. My discussions on the posts placed on TeachBK platforms were based on the
5 items provided to me by my Russian attorney, other asylees (like Mr. Ledestimminov) and my
6 own research about Plaintiff’s postings, comments, and other information Plaintiff provided
7 about herself online. Any of my postings, comments or acts were made in good faith and on the
8 basis of the information provided by Defendant Kiselev’s attorney in Russia, Katkov in his
9 publication, other political asylees (like Mr. Ledestimminov) who interacted with Plaintiff or
10 gleaned from Plaintiff’s own postings.

11 19. I reasonably believed that of my postings, comments or acts were based upon
12 reliable and true information.

13 20. My efforts in this regard are for the purpose of protecting others, not to harm
14 Plaintiff.

15 21. My efforts are aimed at protecting an already vulnerable population of Russian
16 political asylees from perceived harm they often encounter after departure from Russia and
17 once when arrive in the U.S.

18 22. The crux of my posts are a call to our subscribers —consisting mostly of recent
19 refugees fleeing the Russian regime and coming to the U.S. – to exercise caution during various
20 phases of the immigration process (i.e. travel, border crossing, and asylum petition).

21 23. Any posts, statements or acts by me were truthful assertions of fact based on
22 reliable information I received and/or my own opinions based on that information.

23 24. I have no feelings of hatred or ill will toward Plaintiff, nor did I have such
24 feelings at the time Plaintiff claims I made the challenged statements.

25 //

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1 I declare under penalty of perjury under the laws of the United States and California that
2 the foregoing is true and correct and that this declaration was executed in California on the date
3 indicated below.

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5 Dated: October 7, 2024

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ILYA KISELEV 

EXHIBIT 1

 <p>DERZHAVA Unified Federal Legal Center</p>	<p>Address: Moscow, Presnenskaya embankment, 12, floor 44, office 4402 Tel: (966) 123 81 86 e-mail: ukzakon@yandex.ru</p>
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Moscow
September 8, 2023
Out.No 11/08-23IP

Informational Memorandum

The Unified Federal Legal Center "DERZHAVA" has been providing legal/legal rights support to Ilya Vladimirovich Kiselev since 2019.

The DERZHAVA Legal Center provides judicial protection to Mr. I.V. Kiselev in the courts of Moscow in connection with his propagandist/opposition activities in the period from 2019 to 2023.

At the moment, more than 12 court hearings have been held and won (Kuzminsky District Court of Moscow, Moscow City Court) against Moscow deputy Valery Semenovich Katkov (period from 2020 to 2022), and new court hearings are being held in 2023.

On September 1, 2023, Deputy V.S. Katkov (who is also the owner of the pro-Russian print publication "Zhulebinsky Boulevard," and who is currently working on behalf of the Communist Party of the Russian Federation (CPRF)) informed us that a US citizen, Marina Sokolovskaya, had approached him and demanded that he write reports on behalf of Russian authorities (in his capacity as a deputy) asking him to accuse Ilya Vladimirovich Kiselev of immigration fraud.

In personal correspondence, Marina Sokolovskaya provided Deputy Katkov with links to US immigration departments where materials on Ilya Kiselyov should be sent to fabricate a case against him. Additionally, she personally offered her translation services.

Hello. Yes, I read it.
This is where you can write to
the prosecutor in his case.
And you also need to send an
email to
It is necessary to write in
English, indicate his full name
and date of birth. If you need to
translate from Russian into
English, I will translate.

kv Katkov Valeriy –
edit delete

We find it extremely surprising that US citizen Marina Sokolovskaya has close ties to the leadership of the country and provides personal information to deputies about Russian citizens residing in the United States who are seeking political asylum.

Deputy Katkov approached us with this information, proposing to drop the ongoing case in court (Kuzminsky District Court of Moscow) due to new information about our client's presence in the United States. We declined his proposal.

After receiving our refusal, Deputy V.S. Katkov attempted to blackmail our client, Mr. I.V. Kiselev. Deputy V.S. Katkov threatened to compromise Mr. Kiselev I.V.'s identity with the help of Marina Sokolovskaya.

Head of Legal Department

UFLC "DERZHAVA"

Structural subdivision of DERZHAVA Group of Companies

V.V. Andreev /Signature/

Seal:

Russian Federation, Moscow, Limited Liability Company

OGRN 1187746882861 TIN 7703466408 KPP 770301001

-----End of translation-----

Certification by Translator

I, **TATYANA VARGASON**, certify that the foregoing is a complete and accurate translation from Russian to the English language to the best of my ability. I further certify that I am fully competent to translate from Russian into the English language and that I am proficient in both languages.

DMV of NV Approved Translator Number: **T862**

The Supreme Court of Nevada Certification Number: **CANVVT643** (Russian Language)

Date of translation: **April 1, 2024** Translator's phone number: **702-556-8559**

Translator's address: **2026 Silverton Dr, Henderson NV 89074**

Translator's printed name: **TATYANA VARGASON**

Signature:





ДЕРЖАВА
Единый Федеральный
Правовой Центр

Адрес: г. Москва, Пресненская набережная,
д 12, этаж 44, офис 4402
Тел: +7 (966) 123 81 86
E-mail: ukzakon@yandex.ru

г. Москва
08.09.2023г.

Исх.№ 11/08-23ИП

ИНФОРМАЦИОННОЕ ПИСЬМО

Единый Федеральный Правовой Центр «ДЕРЖАВА» оказывает юридическую/правовую поддержку Киселеву Ильей Владимировичу с 2019 года.

Правовой центр «ДЕРЖАВА» оказывает судебную защиту господину Киселеву И.В. в судах г. Москвы в связи с его пропагандисткой/оппозиционной деятельностью в период с 2019 года по 2023г.

На данный момент было проведено более 12 судебных заседаний и выиграны суды (Кузьминский районный суд. г.Москвы, Московский городской суд) с депутатом г. Москвы Валерием Семеновичем Катковым (период с 2020 по 2022 год), а также проводятся новые судебные заседания в 2023 года.

01.09.2023г. депутат В.С Катков (а так же владелец пророссийского печатного издания «Жулебенский бульвар», работающий сейчас в интересах Коммунистической партии Российской Федерации (КПРФ)) сообщил нам, что к нему обратилась гражданка США Соколовская Марина и потребовала написать на Илью Владимировича Киселева доносы со стороны власти РФ (в виде депутата) где она просит обвинить Киселева Илью Владимировича в иммиграционном мошенничестве.

Депутату Каткову Марина Соколовская предоставила в личной переписке ссылки на иммиграционные департаменты США куда нужно отправить материалы по Киселеву Илье, что бы сфабриковать дело против него, а так же предложила услуги своего перевода лично.

Здравствуйте. да, прочли.
Вот сюда можно написать-проку
по его делу

И еще надо отправить письмо в
на

Писать надо на английском, ука:
его полное имя и дату рождения
Если вам нужно перевести с
русского на английский, то я
переведу.

КВ Катков Валерий

зменить

Удал

Для нас крайне удивителен тот факт, что гражданка США Марина Соколовская имеет тесную связь с руководством страны и предоставляет персональную информацию депутатам о гражданах РФ находящихся на территории США и запрашивающих политическое убежище.

Депутат Катков обратился к нам с этими данными с предложением отказаться от ведения текущего дела в суде (Кузьминский районный суд г. Москвы) в связи с новыми данными о его присутствии в США, мы ответили отказом.

Депутат Катков В.С. получив от нас отказ попытался шантажировать нашего клиента господина Киселева И.В. Депутат Катков В.С. угрожал тем, что будет компрометировать с помощью Соколовской Марии личность Киселева И.В.

Руководитель юридического департамента

ЕФПЦ «ДЕРЖАВА»

Структурное подразделение ГК «ДЕРЖАВА»



/Андреев В.В.

EXHIBIT 2

<https://zhylbyl.ru/zakon-sohraneniya-hamstva/>

ALL ARTICLES, HEALTH FRAUD TRUTH FRAUD MORE

RECEPTION ARCHIVE OF NEWSPAPERS

LAW OF PRESERVATION OF RUDENESS

December 2, 2023 | All articles, Opinion | From| 0 comments | ★★★★★

• OPINION •

LAW OF PRESERVATION OF RUDENESS

Rudeness, like mass, does not disappear without a trace and does not arise from nothing. And neither do lies, boasting, and everything else in that vein. These less-than- positive qualities can be brandished like a fan by the antihero of today's story.

It's been almost two years since we last heard anything about the district blogger Ilya Kiselev, who for a long time rudely lectured deputies and ordinary residents of the district on how to live. He hasn't been seen or heard.

And his channel, "Vykhino - the Territory of Twilight," has also disappeared. However, we wouldn't be discovering America by saying that some things may no longer be visible, but their lingering odor remains.

Therefore, we are responding to the request of resident S. from 6/11 Zhulebinsky Boulevard, who inquired about where Mr. Kiselev is now and what he's doing. It turns out, he is still alive and kicking! And even the mention of America, it seems, wasn't accidental.

Kiselev, who had long and tiresomely harped on about his patriotism, quietly emigrated to the USA in January of last year. It doesn't matter that it was illegal; the main thing is that "dreams come true!" There, he launched a campaign in the style of Charlie Chaplin comedies, claiming

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American Translators Association (ATA) member **ID: 278676** in good standing for the year 2024

DMV of NV Approved Translator Number: **T862**

The Supreme Court of Nevada Certification Number: **CANVVT643** (Russian Language)

Date of translation: **October 4, 2024** Translator's phone number: **702-556-8559**

Translator's address: 1000 N. Green Valle Parkway #440-151, Henderson, NV 89074

Translator's printed name: **TATYANA VARGASON**

Signature:

T Vargason



he was allegedly persecuted many times during his time in Russia, while tirelessly slandering Russian reality.

The pseudo-patriot plays the martyr and claims in his videos that he was repeatedly summoned to various "high" offices in Moscow (judging by the context, likely the FSB and Ministry of Internal Affairs) to give explanations. He says he constantly sued the government and won as many as 12 (!!!) cases. This isn't just the work of a fevered imagination. Clearly, Kiselev is building a political case to convince an immigration officer of his right to political asylum. Without yet having refugee status (and it's not guaranteed that he will get it), he is already charging substantial sums to teach others how to obtain it. It's fitting to recall the great Bernard Shaw: "Those who can, do; those who can't, teach."

I was particularly struck by the "business ventures" of the local demagogue. According to him, he managed to work in Rome, Warsaw, and Belgium, and in each place, he was both sought after and successful.

Interestingly, the notorious "Moscow Kiselev" has managed to achieve the same scandalous reputation in America. This time, his "sworn enemies" are none other than his fellow "colleagues" in the immigration business. They are now going to great lengths to prevent the Russian "great martyr" from settling abroad and cluttering the ranks of "honest immigrants."

Therefore, it's too soon to bid farewell to Kiselev. At any moment, he could be kicked out of America in all directions. Where he will end up is anyone's guess. One thing is certain, though—he likely has no desire to return to Russia, where his slander against the country will surely be remembered, with all the consequences that would bring for him.

Correspondent

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T Vargason



<https://zhybyl.ru/zakon-sohraneniya-hamstva/>

ТРЕНДЫ: ЛЮФТ СОВЕСТИ

ПОИСК 🔍

БУЛЬВАР

ВСЕ СТАТЬИ ▾ ЖУЛЬЗДРАВ ▾ ЖУЛЬПРАВДОМ ▾ ЕЩЁ ▾ ПРИЕМНАЯ АРХИВ ГАЗЕТ

ЗАКОН СОХРАНЕНИЯ ХАМСТВА

Дек 2, 2023 | Всестатьи, Мнение | 0# | ★★★★★

• М Н Е Н И Е •

ЗАКОН СОХРАНЕНИЯ ХАМСТВА

Хамство, равно как и масса, не исчезает бесследно и не возникает из ничего. А ещё — зрание, хвастовство и далее везде. Этими не самыми положительными качествами, как реером, может размахивать антигерой сегодняшней публикации.

Почти два года, как о районном блогере Илье Киселёве, долгое время в хамской манере поучавшем депутатов и простых жителей района, как надо жить, ничего не слышно. И даже не видно. И канал его «Вькино — территория сумрака» тоже пропал. Но мы Америку не откроем, если скажем, что бывает нечто такое, чего уже не видно, а запашок остался. Поэтому мы откликнемся на просьбу жителя С. из дома 6/11 по Жулебинскому бульвару, который интересовался, где сейчас господин Киселёв и чем занимается. Оказывается, жив курилка! И даже оговорка про Америку, оказывается, не случайна.



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Киселёв, долго и нудно твердивший о своём патриотизме, преспокойненько в январе прошлого года эмигрировал в США. Неважно, что незаконно, главное – «мечты сбываются!». Там он развернул кампанию в стиле комедий Чарли Чаплина по поводу якобы многочисленных гонений на него в период проживания в России и заодно без усталости клеветает на российскую действительность.

Псевдопатриот корчит из себя великомученика и рассказывает в своих видео, как в Москве его неоднократно вызывали для дачи объяснений в различные «высокие» кабинеты (судя по контексту – в ФСБ и МВД), как он постоянно судился с властью и выиграл у неё аж 12 (!!!) судов. Это не просто игра больного воображения. Очевидно, так Киселёв формирует политический кейс, чтобы доказывать иммиграционному офицеру своё право на политическое убежище. Не имея статуса политического беженца (и не факт, что приобретёт), он уже за немалые деньги начинает учить других, как его получить. Впору вспомнить великого Бернарда Шоу: «Кто умеет, делает; кто не умеет, учит других».

На меня особое впечатление произвели «бизнес- проекты» районного демагога. По его словам, он успел поработать и в Риме, и в Варшаве, и в Бельгии. И везде был востребован и успешен.

Что характерно, скандальный «московский Киселёв» и в Америке получил похожую скандальную известность. На этот раз его «заклятыми оппонентами» стали «коллеги», занимающиеся иммиграционным бизнесом. Сейчас они прилагают максимум усилий, чтобы не дать российскому «великомученику» застрять на чужбине, засоряя ряды «честных иммигрантов».

Поэтому прощаться с Киселёвым рано. Не ровен час, его выставят из Америки на все четыре стороны. И куда ему податься – большой вопрос. Но в Россию, где ему сразу припомнят клевету на страну со всеми вытекающими для него последствиями, ему наверняка не хочется.

Собкор

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